

PROJECT ALTERNATIVES

CHAPTER 4.0 – PROJECT ALTERNATIVES

4.1 Rationale for Alternative Selection

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of “a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” The Proposed Project was determined to result in no potentially significant and unmitigated impacts. The Project was determined to have significant but mitigable impacts to aesthetics/visual resources, biological resources, cultural resources, transportation/traffic, noise and paleontological resources (see Chapter 2.0 of this EIR).

Section 15126.6(f) also states that “the range of alternatives in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The State CEQA Guidelines provide several factors that should be considered in regard to the feasibility of an alternative. Those factors include: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site (if an off-site alternative is evaluated).

As described in detail in Section 1.2.2.4 of this EIR, the Project has a substantial planning history. Extensive coordination with the County and resource agency staff, as well as with Project neighbors, resulted in substantial modifications to the Proposed Project to reduce the associated potential environmental impacts. The Proposed Project would be, as a result, substantially less impactful than the originally proposed project would have been. In fact, since the CEQA document for the Project was intended to be a MND, rather than an EIR, County staff and the Applicant had refined the Project to a level addressing stated neighborhood concerns as well as those of reviewing agencies adequate to either eliminate or reduce all impacts to less than significant levels. The fact that these modifications already have been incorporated into the Proposed Project reduces the extent to which alternatives are available which would further reduce significant environmental impacts.

In accordance with Section 15126.6(e) of the State CEQA Guidelines, a “no project” alternative shall be evaluated, along with its impact. There are two potential scenarios for the no project alternative: (1) the No Project/No Development Alternative, in which the proposed development would not occur, and the existing conditions at the Project site as of the date that the NOP was published would continue over the long-term and (2) the No Project/Existing Zoning Alternative, in which the proposed development would not occur, and it is assumed that development would occur in the foreseeable future based on the existing allowable land use (e.g., in accordance with the current zoning designation). These two no project alternatives are analyzed in Subchapters 4.2 and 4.3 below. In addition, a Reduced Project Alternative is analyzed in Subchapter 4.4.

For each of the alternatives described above, the potential impacts of the alternative are described briefly and qualitatively and are compared to the impacts of the Proposed Project. A comparison of the alternative impacts to Proposed Project impacts is included in Table 4-1, Comparison of Project Alternative Impacts to Proposed Project Impacts.

The alternatives are also assessed relative to their ability to meet the basic objectives of the Proposed Project. As described in Subchapter 1.1, the specific objectives of the Project are to:

- Provide a clustered residential community in general conformance with the existing General Plan density
- Protect sensitive environmental resources and steep slopes within the Specific Plan
- Provide a fire-safe community
- Retain privacy for abutting property owners
- Cluster development in the less visually prominent portions of the site
- Provide open space and biological mitigation in conformance with regional plans and ordinances
- Provide for the maximum amount of on-site mitigation

4.2 Analysis of the No Project/No Development Alternative

4.2.1 No Project/No Development Alternative Description and Setting

This subchapter evaluates the No Project/No Development Alternative, which assumes that the Project site continues in an undeveloped state of native and non-native habitats over the long term. The 94.4 acres of native habitat throughout the site would remain, with the possible exception of limited fuel management for adjacent residential properties. The Proposed Project, including supporting infrastructure (i.e., roadways and utilities connections), would not be constructed. This alternative would not attain most of the Project objectives, as it would not provide residential uses, and would not protect steep slopes and sensitive biological resources by placing them in open space easements. Potential benefits to the abutting neighborhood in terms of fire safety (via placement of fire walls between existing uses and wildlands) would not occur. The only objective that the No Project/No Development Alternative would attain would be retention of privacy for abutting property owners, as on-site conditions would continue, with no developed use on site.

4.2.2 Comparison of the Effects of the No Project/No Development Alternative to the Proposed Project

Aesthetics/Visual Resources

No change to existing visual conditions would occur under this alternative. The site would remain undeveloped, with a mix of natural and disturbed elements. From a distance (where the vast majority of viewers are located) the impression of a large block of native land would continue, and the location where proposed homes would have comprised part of future views would remain undeveloped. The significant impact identified for the Proposed Project would not occur.

Biological Resources

The site would continue in its current condition, containing native and disturbed habitats. Current use of the site for informal recreational activities by area residents (dog walking, horse riding, bike riding) would continue, with associated incursions into biologically valuable habitat that would be protected and managed if the Proposed Project were to be approved. Project-related direct and indirect short- and long-term impacts to biological resources, including coast live oak woodland, Diegan coastal sage scrub and non-native grassland would not occur. These areas are the habitat of the coastal California gnatcatcher and various raptor species. The Proposed Project also would result in significant direct impacts to ACOE and CDFG jurisdictional areas. These significant impacts to sensitive habitats and species and jurisdictional areas would not occur under the No Project/No Development Alternative, although some effects to Cleveland Trail might occur as a result of upgrades required of an existing proposed development in that area (the Leese property).

Significant new indirect impacts associated with Project construction and long-term occupancy of the site by people and their pets also would not occur under this alternative, although as noted above the existing condition demonstrates a substantial amount of ongoing activity. The Proposed Project would limit existing incursions into the open space by installing fire walls along the urban/wildland interface and fencing along Sugarbush Drive and posting signs stating that access to the area is prohibited. The proposed fire walls also are anticipated to limit the potential for pets to use the open space. Whereas the homes currently abutting open space are not subject to landscaping controls, homes within the Proposed Project would be prohibited from using invasive plant species in their landscaping, and the potential for non-native species to spread would further be limited by the fire walls. The existence of an HOA and Habitat Manager charged with protection of the open space also would be expected to result in a reduction of at least some indirect impacts, compared to the current uncontrolled condition. Despite the anticipated lessening of indirect effects, due to the direct loss of habitat that would be associated with the Proposed Project, this alternative would have much less impact with regard to biological resources.

Cultural Resources

No cultural resources have been identified on the Project site. No impacts to cultural resources are therefore anticipated; however, impacts to currently unknown archaeological resources could occur. Such potential impacts would be mitigated through grading monitoring and appropriate treatment of any discovered resources. The No Project/No Development Alternative would avoid these potential but unanticipated impacts. Therefore, potential impacts to cultural resources are considered to be less than those compared to the Proposed Project.

Transportation/Traffic

The Proposed Project would generate an estimated 540 vehicle trips per day and result in significant direct impacts to segments of South Santa Fe Avenue and Robelini Drive, as well as impacts to the Buena Creek Road/Monte Vista Drive intersection. The Project would mitigate these impacts to below a level of significance through intersection improvements. The Project also would considerably contribute to cumulative traffic impacts at seven roadway segments and six intersections. These impacts would be mitigated through a combination of intersection improvements and fair-share contributions. Under the No Project/No Development Alternative, no traffic would be generated by the Project site and the adverse direct impacts to roadway segments and intersections would not occur. The Proposed Project's contribution to significant cumulative traffic impacts would not occur. This alternative would have no impact with regard to transportation/traffic issues.

Noise

The Proposed Project has the potential to result in significant short-term noise impacts associated with construction of the Project and associated improvements to Cleveland Trail. Significant impacts would, however, be mitigated through the use of quieter equipment, restriction of specific construction activities (e.g., a potential rock breaking locale) to interior portions of the site, limited construction hours and/or the construction of noise attenuation barriers. Under the No Project/No Development Alternative, the potential for these significant temporary noise impacts would be avoided. This alternative would have no impact with regard to noise issues.

Paleontological Resources

The geologic formations on site have no, low or marginal paleontological resource sensitivity ratings. The only formation considered to have potential to contain paleontological resources, the volcanoclastic units of the Jurassic Santiago Peak Volcanics, are considered to have a limited probability for producing

fossils due to known (albeit infrequent) occurrences of important fossils within these strata at off-site locations. The excavation operations associated with construction of the Proposed Project therefore have potential to result in significant paleontological resource impacts. Such impacts would be mitigated through paleontological monitoring during construction and appropriate treatment of any resources discovered. The No Project/No Development Alternative would avoid this potential impact.

Conclusions

The No Project/No Development Alternative is environmentally superior to the Proposed Project because it would avoid the environmental impacts associated with the Proposed Project. This alternative also would not develop housing on the property, which is the land use specified in the General Plan for the property. The No Project/No Development Alternative would not meet the basic Project objective of providing a residential development, nor would it protect steep slopes and sensitive biological resources by placing them in open space easements.

4.3 Analysis of the No Project/Existing Zoning Alternative

4.3.1 No Project/Existing Zoning Alternative Description and Setting

Under the No Project/Existing Zoning Alternative, development would occur in accordance with the site's existing zoning, as well as General Plan designations and NCM Subregional Plan policies. No discretionary permit applications for a GPA, Specific Plan, or Rezone would be required. This alternative has been included per CEQA requirements (CEQA Guidelines Section 15126.6(e)(3)(A)) as well as neighborhood request. The Project site's land use designation, (17) Estate Residential, generally requires minimum parcel sizes of two or four acres or larger, depending on slope criteria. Thus, the No Project/Existing Zoning Alternative would include 26 residential lots with a minimum lot size of two acres and 2 lots with detention/bioretenention basins (Figure 4-1).

This alternative would arrange residential lots along one, rather than two, residential streets. The disturbance footprint for the area south of Cleveland Trail would be essentially the same as that for the Proposed Project. Although lots would extend further to the east than with the Proposed Project (to achieve the two-acre minimum lot size), the grading footprint would retain the same 500-foot wide buffer from the eastern boundary as proposed by the Project. This buffer would be placed within a biological open space easement. Several lots would be located to the northwest and east of the Sugarbush Drive extension. The lots located east of Sugarbush Drive would be a minimum of four acres, due to the steepness of the slopes in this area. In each of these areas, the building pad would be located close to the future street or abutting existing residential lots, and the portion of the lot beyond the limits of grading would be placed within a biological open space easement. Earthwork would be balanced on site, with approximately 345,000 cubic yards each of cut and fill. Slope heights along the site's western boundary (south of Cleveland Trail) would range from approximately 30 to 60 feet in height in order to support pads adequate for larger homes and associated ancillary structures anticipated for two-acre, rather than half-acre lots. However, for the most part, the toe of these slopes would be located further east of the western property boundary. Whereas the setback from western property line to building edge would be at least 100 feet for the Proposed Project, under this alternative the manufactured slopes supporting the pad do not begin until 100 feet east of the western property line, and some are closer to 150 to 175 feet east of the property line. The toe of slope also undulates, rather than meeting the existing grade in a straight line.

Slopes associated with the detention/bioretenention basins also would vary from those of the Proposed Project. The Lot E basin just south of Cleveland Trail would have a maximum 15-foot slope between the basin and the property line. The eastern side of the basin would slope upward approximately 14 feet to a bench, after which another manufactured slope would extend upward 25 feet to base of pad. For the

southern-most basin (Lot D), the west-facing slopes abutting the property line would be less than 5 to 10 feet in height and the slope between the basin and residential pad would be approximately 35 feet in height. In other respects (e.g., landscaping along Sugarbush Drive and the detention/bioretenion basins, emergency access, off-site improvements, etc.), this alternative would be generally consistent with the Proposed Project.

Most of the Project objectives could be attained under this alternative. A residential community in conformance with General Plan density would be provided. In addition, the majority of sensitive biological resources and steep slopes would be placed into open space, fire walls would be provided—resulting in a fire-safe community—with the associated benefits to abutting existing residential uses to the west, and open space and biological mitigation would occur in conformance with regional plans and ordinances.

This alternative would not provide a clustered development. Some of the lots (e.g. 1-3) would be located in area that was proposed as open space by the Project, slightly increasing the visibility of this alternative's development footprint. This alternative also would not be as successful as the Proposed Project in terms of privacy retention for abutting property owners. Although set back 100 feet or more from the western property boundary, Lots 1-3 would be sited very close to homes in the Sugarbush development to the north, resulting in a loss of privacy for a few off-site residences. Finally, the amount of on-site mitigation provided under this alternative would be less than the proposed Project, although impacts would still be fully mitigable on site.

4.3.2 Comparison of the Effects of the No Project/Existing Zoning Alternative to the Proposed Project

Aesthetics

This alternative would introduce fewer, but larger residential lots (26 as opposed to 45) into the viewshed than the Proposed Project. Lots 1 through 10, and 18 through 26 would contain open space easements in order to contain development activity and maintain a 500-foot open space buffer along the eastern property boundary. Excluding those easements, it is anticipated that parcel owners would develop the totality of their lots. This could include ancillary structures, pools, recreational courts, corrals, etc. as well as ornamental landscaping or small parcel grove uses. While visually consistent with area development, this layout would introduce developed uses into portions of the site that would remain in open space under the Proposed Project.

Slope creation to support pads would face northerly on lots 1 through 8. Similar to the Proposed Project, however, it is anticipated that these slopes would be generally obscured by the residential structures and private lot landscaping that would follow. For lots 4 through 8 in particular, manufactured slopes would be shielded from off-site viewers to the north both by the dense vegetation along Buena Creek Road and the natural slope rising just to the north of the manufactured slopes. Slope heights along the western Sugarbush property boundary (adjacent to the Lone Oak neighborhood, between the emergency access connection to Cleveland Trail and Street C) under this alternative generally would be similar to those for the Proposed Project for the lots north of Street C/Lone Oak Lane (30 to 43 feet, compared to 30 to 42 feet for the Proposed Project). Four residential lots and a detention basin would abut this portion of the western boundary under this alternative (as opposed to five residential lots and a detention basin under the Proposed Project). South of Street "C," the slope heights under this alternative would increase to approximately 60 feet in height. Three residential and one detention/bioretenion lots would abut this western boundary under this alternative, similar to the Proposed Project. With the exception of slopes associated with the detention/bioretenion basins on lots D and E (discussed below), manufactured slopes would be set back approximately 100 to 175 feet from the property boundary, thereby minimizing their

visual obtrusiveness. The toe of slope would be additionally contoured, thus rendering these slopes more similar to the natural steep slopes that occur in the vicinity. Similar to the Proposed Project, no CEQA-significant impact is assessed to that landform modification based on the extremely small number of viewers immediately affected.

Although Sugarbush property owners could retain the western-most portions of lots 12 through 17 in existing conditions, as noted above, it is also possible that they could fully develop the lots. While this could result in less vegetation (or even developed uses) intervening between the existing and future Sugarbush structures than the Proposed Project, the variety of lot use and landscaping anticipated under these individually landscaped lots would be consistent with the area. Similar to the Proposed Project, the slopes associated with this alternative also would require the enhanced landscaping plan identified as mitigation for the Proposed Project in order to more quickly shield the manufactured slopes. Privacy fencing/walls associated with the lots would be likely to extend to (and along) the parcel limits, resulting in a variety of barriers along the western property line. It is likely that structural improvements and landscaping of the two-acre lots would occur at various timeframes, commensurate with individual homeowner improvement plans, rather than all at one time, which would occur under the Proposed Project.

Lots D and E would contain detention/bioretention basins in the areas closest to the property lines. This would result in 15-foot (Lot D) and 5 to 10-foot (Lot E) fill slopes being located immediately adjacent to the western boundary, with no setback. For the basin on Lot D, the western slope would extend along approximately 125 feet of the abutting western property line. On Lot E, the detention basin would be aligned along approximately 270 feet of the western boundary. These slopes would be planted and maintained by the HOA, similar to the Proposed Project.

Overall, and especially for more distant viewers, the alternative would introduce additional developed uses into a viewshed that would retain open space views for a greater number of viewers under the Proposed Project. Additional “neighborhood” homes to the south would see additional development associated with lots 6 through 10, and homes on Sugarbush would immediately abut lots 1 through 3 and would have some views open to lots 4 and 5.

The entire site would be accessed through a single street rather than the loop system proposed for the Project. Although the Proposed Project could be considered preferred over the alternative for viewers retaining open space views, overall the alternative scenario would not be inconsistent with community character and generally would be expected to be preferred by the immediately abutting neighbors to the west. These viewers would experience fewer abutting lots overall and greater distance from the residential pads and slopes. Although ancillary uses could be sited closer to existing uses, intervening slope heights between the existing and residential pads would be expected to provide levels of privacy related to home locations similar to the Proposed Project. The reverse would occur for neighbors in the Sugarbush community, where pads would abut the property line. As noted above, views from the south also would include additional development compared with the Proposed Project, and viewers would be expected to respond differently, with some preferring a smaller footprint, and some preferring the more open development pattern. From the distance at which most viewers would see the property, the benefit of the single roadway would be balanced by the greater incursion into proposed open space. Assuming that property owners comply with County Grading Ordinance Section 87.417, Planting, requiring a minimum of one shrub or tree every 100 square feet for slopes exceeding 15 feet in height, this alternative would be considered preferred overall to the Proposed Project with regard to potential impacts to aesthetics. In addition, the enhanced planting scheme for buffering construction-period loss of vegetation for property owners located to the west would not be required. This CEQA significant impact would be eliminated by this alternative.

Biological Resources

The No Project/Existing Zoning Alternative would result in increased impacts to Diegan coastal sage scrub (approximately four acres; including disturbed coastal sage scrub) compared to the Proposed Project. This alternative would impact a location where a coastal California gnatcatcher pair was observed, which would not be impacted by the Proposed Project. Although, as noted above, this alternative would retain a 500-foot wide open space buffer along the eastern boundary of the site, connectivity across Sugarbush Drive would be reduced to an approximately 525-foot wide area, constricting potential local wildlife movement through the property. Given the limited wildlife movement functions currently served by the Project site, impacts associated with this alternative would nonetheless remain less than significant.

Impacts to sensitive vegetation communities and species would be reduced to below a level of significance through habitat preservation, as would occur for the Proposed Project; however, it is unknown whether all upland mitigation requirements could be met on site under this alternative, as the reduced connectivity to open space in the northwestern portion of the site may limit the amount of area authorized for use as mitigation. This alternative would have increased impacts with regard to biological resources.

Cultural Resources

As there are no known cultural resources on the site, no associated impacts are anticipated. Because it would result in disturbance of additional areas, however, this alternative would incrementally increase the potential for grading activities to disturb previously unrecorded cultural resources. Similar to the Proposed Project, associated impacts would be mitigated to below a level of significance through archaeological monitoring and appropriate treatment of any identified resources. Therefore, this alternative would be considered equal overall to the Proposed Project with regard to potential impacts to cultural resources.

Transportation/Traffic

The No Project/Existing Zoning Alternative would generate approximately 312 ADT, or approximately 228 ADT less than the Proposed Project. This reduction in ADT would reduce direct impacts to Robelini Drive between South Santa Fe Avenue and SR 78 (which would be significant under the Proposed Project) to below a level of significance. Other direct and cumulative impacts would be incrementally reduced due to the reduction in ADT; however, the significance of the remaining impacts would remain the same as described for the Proposed Project. Significant impacts would be reduced to below a level of significance through a combination of off-site improvements and fee payments, as described for the Proposed Project. This alternative would have less impact with regard to transportation/traffic due to the elimination of the direct impact to Robelini Drive.

Noise

The noise impacts associated with the No Project/Existing Zoning Alternative generally would be similar to those described for the Proposed Project. That is, long-term noise impacts would be less than significant, but temporary significant noise impacts could occur during construction activities. Although grading for pads would be pulled easterly, detention/bioretenion basin grading would continue to immediately abut the western property line. This alternative would result in increased construction-period noise impacts to residential uses located northeast of the Project site, as this alternative would involve grading and construction activities for three homes in an area that would remain in open space under the Proposed Project. As with the Proposed Project, significant impulsive noise impacts would be avoided

through restriction on the location of rock-breaking activities. Other construction-period noise impacts would be reduced to below a level of significance through use of quieter equipment, reduced construction hours and/or installation of noise attenuation barriers. Because additional noise would be introduced to the off-site area adjacent to lots 1 through 3 associated with grading and construction, this alternative would have slightly increased noise impacts compared to the Proposed Project.

Paleontological Resources

Because it would result in similar graded disturbance area, the No Project/Existing Zoning Alternative would have similar potential for grading activities to disturb paleontological resources, compared to the Proposed Project. However, the potentially affected formations are not identified as being of high sensitivity, and associated impacts would be mitigated to below a level of significance through paleontological monitoring and appropriate treatment of any identified resources (similar to the Proposed Project). Therefore, this alternative would be considered equal overall to the Proposed Project with regard to potential impacts to paleontological resources.

Conclusion

The No Project/Existing Zoning Alternative would be preferred over the Proposed Project with regard to transportation/traffic issues because it would reduce associated traffic generation, thereby avoiding a significant direct impact to Robelini Drive between South Santa Fe Avenue and SR 78. With regard to aesthetics issues, this alternative would be preferred over the Proposed Project. This alternative is also regarded as having equivalent impacts with regard to cultural and paleontological resources, but increased impacts with respect to noise and biological resources. This alternative would meet most of the identified project objectives.

4.4 Analysis of the Reduced Project Alternative

4.4.1 Reduced Project Alternative Description and Setting

The Reduced Project Alternative would include 28 residential lots with a minimum lot size of one acre and 2 lots with detention/bioretenion basins (Figure 4-2). As described in Section 3.1.4, clustering on lot sizes a minimum of one acre would be permitted under the existing Estate Development Area General Plan designation and would not require any changes to the NCM Subregional Plan. No General Plan Amendment or Specific Plan would be required. This alternative would still require a rezone, because it would not be consistent with the current zoning requirements for minimum two-acre lot sizes.

This alternative would arrange lots along one, rather than two, residential streets. The disturbance footprint for the area south of Cleveland Trail would be essentially the same as that for the Proposed Project. The grading footprint would be reduced, and earthwork would be balanced on site, with approximately 238,000 cubic yards each of cut and fill. This alternative would, however, include three residential lots with open space to the north of the onsite emergency access connection to Cleveland Trail, in an area that would include a detention/bioretenion basin and open space under the Proposed Project. An open space easement would be placed on these lots beyond the limits of grading. South of the Cleveland Trail junction, 11 residential lots would be sited along the western property line under this alternative, compared to 8 under the Proposed Project.

The northernmost detention/bioretenion basin would parallel the western property line for 485 feet west of residential lots 22 through 25. The slope between off-site properties and this basin would be five feet high. The toe of manufactured slopes located east of the basin would be located an additional 65 to 120 feet from the basin's east edge (or approximately 130 to 200 feet east of the property line) and would be

up to 38 feet in height. The pads on the residential lots would be located approximately 200 to 220 feet from the property line. The southern basin would extend along approximately 125 feet of the western boundary just south of Street “B” and west of lot 19, with westward facing slopes approximately 7 feet high. The southern edge of the basin would be comprised of north-facing slopes approximately 20 feet high. The pad for Lot 19 would be placed approximately 220 feet east of the western boundary, at the top of a slope extending approximately 63 feet higher than the basin. In other respects (e.g., landscaping along Sugarbush Drive and detention/bioretention lots, emergency access, off-site utility improvements, etc.), this alternative generally would be consistent with the Proposed Project.

Most of the Project objectives could be attained under this alternative, and the alternative would cluster residences and site development in the less visible portions of the site. A residential community in conformance with General Plan density would be provided. In addition, the majority of sensitive biological resources and steep slopes would be placed into open space, fire walls would be provided—resulting in a fire-safe community—with the associated benefits to abutting existing residential uses to the west, privacy for abutting property owners would be generally consistent with that provided by the Proposed Project, and open space and biological mitigation would occur in conformance with regional plans and ordinances.

4.4.2 Comparison of the Effects of the Reduced Project Alternative to the Proposed Project

Aesthetics

This alternative generally would restrict development to a footprint very similar to that of the Proposed Project, with large open space uses being retained in the northern and eastern property extents. The lower number of overall residential lots (28 as opposed to 45) would result in the lots being twice as large. Similar to the No Project/Existing Zoning Alternative, it is anticipated that parcel owners would develop the totality of their lots. This could include ancillary structures, pools, recreational courts, corrals, etc. as well as ornamental landscaping or small parcel grove uses. Six residential lots would be located along the western boundary between the access to Cleveland Trail and Street “B,” as opposed to five lots under the Proposed Project. South of Street “B” five residential lots would be located along the western boundary, as opposed to three under the Proposed Project. Three residential lots would be located north of the emergency access to Cleveland Trail, in an area identified for stormwater management and open space under the Proposed Project.

Similar to the Proposed Project, it is anticipated that interior slopes (in particular along lots 1 through 13) would be obscured by the residential structures and private lot landscaping that would follow. Landform modification in the western portion of the Sugarbush parcel (adjacent to the Lone Oak neighborhood) generally would be similar to that for the Proposed Project. Residential pads would be supported by slopes 20 to 40 feet in height; however, the base of these slopes would be approximately 100 feet from the western property line, thus reducing their visual obtrusiveness. Slopes associated with the detention basins west of residential lots 19 and 22 through 25 would immediately abut the property line. As noted above, the northernmost basin would parallel the western property line for 485 feet, with five-foot slopes. The southern basin would have west-facing slopes of approximately 7 feet in height, and north-facing slopes approximately 20 feet high. The tallest slope would be associated with the southern detention/bioretention basin on Lot 19. The slope between the basin and residential pad on Lot 19 would be approximately 63 feet in height, or 21 feet higher than west-facing slopes associated with the Proposed Project. The pads on the residential lots closest to the Lone Oak neighborhood would be located approximately 215 to 240 feet from the property line.

Excluding the detention/bioretention basins, slopes along the western property line would be rounded at the base, and the slopes generally would be contoured, thus allowing them (following revegetation) to

appear similar to the natural steep slopes that occur elsewhere in the vicinity. Similar to the Proposed Project, no CEQA-significant impact is assessed based on the extremely small number of viewers affected.

Although Sugarbush property owners could retain the western-most portions of lots 15 through 18, 20 and 21, in existing conditions, it is also possible that the lots could be fully developed. Lot-specific privacy fencing or walls could be located between lots and along the western property line. Unlike the Proposed Project, it is likely that any activity would occur at various timeframes, commensurate with individual homeowner improvement plans, rather than all at one time.

Slope vegetation maintained by the HOA would shield the basin slopes.

Development of the site under this alternative would be consistent with existing development in the area due to consistency of the proposed lot sizes with the mixed sizes of lots in the vicinity as well as permitted uses allowed under consistent zoning. It is expected that the alternative would be somewhat preferred over the Proposed Project for neighbors located immediately to the west, as well as for viewers from the south. Neighbors to the west have expressed preference for larger lot size development and placement of the western fill slopes farther to the east. However, a greater number of residential pads would be in proximity to the western property line. For viewers from the south, inclusion of residential lots 26, 27 and 28 north of Cleveland Trail would result in a slightly expanded development footprint, although it would not be expected to visually “read” as such. The alternative would result in a view of lesser development due to only two rows of homes being constructed within a narrower graded footprint. That view is longer distance, however, and also is shared by a very small number of viewers (from approximately five residences). For more distant viewers from the west and north, roofs would show among tree canopies. All of the development would occur within approximately 800 feet east-west, regardless of the number of lots or structures. This developed area, abutted by the undeveloped large hill to the east, could visually “read” similarly to the Proposed Project, but would only contain one access road (Street “A”) as opposed to the loop road under the Proposed Project. Viewers who would experience only views to on-site open space under the Proposed Project would be expected to have the same views under this alternative. Views from the existing Sugarbush Drive development would be substantially the same given the oblique line of sight to the more northerly lots and the intervening planting along extended Sugarbush Drive.

Given the overall similarity of views to the site from existing Sugarbush Drive residents; the balance to changes in views from the south (fewer homes and one less street but a potentially similar development footprint); the stated preference for larger lots by the immediately abutting property owners; and, the placement of most of the western fill slopes more than 100 feet to the east of the western boundary; this alternative is expected to be preferred by the community. Although long-term CEQA impacts would be less than significant for both the Proposed Project and this alternative, the Reduced Project Alternative is viewed as having less visual impact compared with the Proposed Project.

Biological Resources

The Reduced Project Alternative would result in incrementally reduced impacts to Diegan coastal sage scrub (approximately 1.5 acres), compared to the Proposed Project. Other biological impacts are anticipated to be similar under this alternative to those described for the Proposed Project. Impacts to sensitive vegetation communities and species would be reduced to below a level of significance through habitat preservation, as would occur for the Proposed Project. This alternative would have slightly less impact to biological resources than the Proposed Project.

Cultural Resources

As there are no known cultural resources on the site, no associated impacts are anticipated. Because it would result in disturbance of additional areas, however, this alternative would incrementally increase the potential for grading activities to disturb previously unrecorded cultural resources. Similar to the Proposed Project, associated impacts would be mitigated to below a level of significance through archaeological monitoring and appropriate treatment of any identified resources. Therefore, this alternative would be considered equal overall to the Proposed Project with regard to cultural resources.

Transportation/Traffic

The Reduced Project Alternative would generate approximately 336 ADT, or approximately 204 ADT less than the Proposed Project. This reduction in ADT would reduce direct impacts to Robelini Drive between South Santa Fe Avenue and SR 78 (which would be significant under the Proposed Project) to below a level of significance. Other direct and cumulative impacts would be incrementally reduced due to the reduction in ADT; however, the significance of the remaining impacts would remain the same as described for the Proposed Project. Significant impacts would be reduced to below a level of significance through a combination of off-site improvements and fee payments, as described for the Proposed Project. This alternative would have less impact with regard to transportation/traffic due to the elimination of the direct impact to Robelini Drive.

Noise

The noise impacts associated with the Reduced Project Alternative would be similar to those described for the Proposed Project. That is, long-term noise impacts would be less than significant, but temporary significant noise impacts could occur during construction activities. The noise generated by construction activities on the Project site could be incrementally less than the Proposed Project because the amount of grading and home construction would be reduced and primary landform modification would be located further east than under the Proposed Project. Grading for the detention/bioretention basins would continue to occur immediately adjacent to the western property line. No new sensitive receptors, however (as were identified for the No Project/Existing Zoning Alternative above), would be in proximity to this alternative. Because the additional lots proposed north of Cleveland Trail would not be adjacent to existing homes, associated construction would not result in a meaningful change in the level of temporary noise impact. As with the Proposed Project, significant construction-period noise impacts would be reduced to below a level of significance through use of design considerations, quieter equipment, reduced construction hours and/or installation of noise attenuation barriers. This alternative would be slightly preferred over the Proposed Project with regard to noise impacts.

Paleontological Resources

Because it would result in less graded disturbance area, the Reduced Project Alternative would incrementally decrease the potential for grading activities to disturb paleontological resources, relative to the Proposed Project. However, the potentially affected formations are not identified as being of high sensitivity, and associated impacts would be mitigated to below a level of significance through paleontological monitoring and appropriate treatment of any identified resources for this alternative (similar to the Proposed Project). Therefore, this alternative would be considered to have similar potential impacts with regard to paleontological resources as the Proposed Project.

Conclusion

The Reduced Project Alternative would have less impact compared to the Proposed Project with regard to transportation/traffic issues because it would reduce associated traffic generation, thereby avoiding a significant direct impact to Robelini Drive between South Santa Fe Avenue and SR 78. This alternative is also thought to have less visual impact than the Proposed Project, primarily because there would be fewer homes, one less street, and the toe of western fill slopes associated with residential uses would be located further east of the Project's western boundary. Impacts to biological resources and noise also would be slightly reduced. This alternative would have similar impacts with regard to cultural and paleontological resources. This alternative would also meet the identified project objectives.

4.5 Environmentally Superior Alternative

Although the No Project/No Build Alternative would result in substantially reduced environmental impacts, Section 15126.6(e)(2) of the State CEQA Guidelines requires identification of an alternative other than the No Project as the environmentally superior alternative.

The Reduced Project Alternative is considered the Environmentally Superior Alternative because a significant direct traffic impact to Robelini Drive is avoided, and visual impacts would be lessened. In addition, this alternative would be slightly preferred over the Proposed Project for the issues of noise and biological resources.

4.6 Alternatives Considered and Rejected

In accordance with State CEQA Guidelines Section 15126.6(f), an off-site alternative should be considered if development of another site is feasible and if development of another site would reduce or avoid significant impacts of the Proposed Project, and per Section 15126.6(f)(1), "...whether the proponent can reasonably acquire, control or otherwise have access to the alternative (or the site is already owned by the proponent)." State CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in looking at an off-site alternative is "...whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location."

The Project Applicant purchased the 115.5-acre Project site with the plan to develop with up to 47 residential dwelling units, as permitted in the General Plan or more (up to 57 units) as provided based on the zoning. The intent was to obtain a parcel that could support approximately 50 high-end residential units sited close enough to major roadways and existing services that residents would be able to rely upon and support services in already developed areas. Understanding that substantial biological mitigation also would be required for any project affecting native habitats, the parcel also needed to be large enough to allow for potential on-site mitigation, retaining valuable biological resources on site rather than elsewhere in the area.¹ As can be seen from review of Figure 1-5 in Chapter 1.0 of this EIR, comparably sized parcels with similar development potential are unavailable in the Buena Vista/Twin Oaks area. The surrounding area consists of existing development in the unincorporated County as well as in the cities of Vista, San Marcos and Escondido. The remaining undeveloped land consists largely of areas with steep topography and sensitive native habitats, much of which is encompassed within biological preserves planned as part of the Multiple Habitat Conservation Plan and North County MSCP. Other large parcels are not for sale or are currently agricultural in nature.

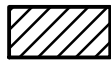
¹ This was considered both biologically preferable and market wise as the on-site open space was expected to contribute to the value of the Project as perceived by the purchaser.

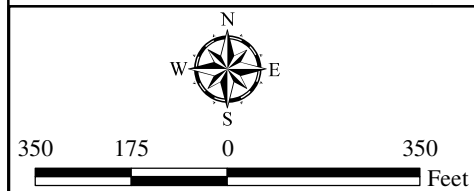
Even if such a parcel could be made available at this time, the question of whether environmental impacts of the Proposed Project would be “avoided or substantially lessened by putting the project in another location” must be answered. As discussed in Chapter 2.0 of this EIR, significant impacts associated with the Proposed Project can be mitigated.

The Proposed Project has been specifically designed to minimize impacts to steep slopes and sensitive biological resources. Additionally, while many properties in the vicinity have identified cultural resources and/or wetlands regulated under the RPO, these have not been identified within the Sugarbush residential parcel. Mitigation for upland habitat impacts would occur on site, keeping the area affected and the mitigation in one location and including enhancement of some of the currently degraded native habitat on site. No reliance on mitigation area in limited mitigation banks in the area would occur for these resources. Traffic impacts are associated with the number of ADT on area roads. Given overall traffic loading onto major roads, state routes and interstates in this part of the County, locating the Project anywhere in the vicinity would be expected to have similar effects (if not on the precise intersections impacted by the Proposed Project, then on similar ones). These impacts are mitigated by the Proposed Project. While it is anticipated that adequate mitigation also would be required (and provided) at another locale, it would not avoid or substantially lessen the occurrence of such impacts. Paleontological impacts are relatively minimal, and because they are related to geological formations that underlay large geographical areas, equal or potentially greater impacts would be anticipated for any other location. It is expected that any site chosen within this portion of the County could have similar aesthetic impacts, and—in this topographically varied portion of the County—could have substantially greater impacts due to potential increased visibility. Finally, if another parcel of appropriate size could be located, it could support current agricultural activities. This could result in a new significant impact not occurring at the current site. As there is currently no mitigation bank for agricultural impacts, there is a theoretical potential for a significant and unmitigable impact that would not occur with the Proposed Project.

Taking each of these elements into consideration, there are no feasible alternative sites in the Buena Vista/Twin Oaks area of similar size, with comparable development potential, that would result in substantially reduced impacts when compared to proposed development on the Sugarbush site.

Table 4-1 COMPARISON OF PROJECT ALTERNATIVE IMPACTS TO PROPOSED PROJECT IMPACTS			
Environmental Issue	Alternative		
	No Project/No Development	No Project/ Existing Zoning	Reduced Project Alternative
Aesthetics	Less	Less	Less
Biological Resources	Less	Greater	Less
Cultural Resources	Less	Similar	Similar
Transportation/Traffic	Less	Less	Less
Noise	Less	Greater	Less
Paleontological Resources	Less	Similar	Similar

 Alternative Open Space



Job No: BOO-09 Date: 10/07/09


Source: bha, inc. (2009)

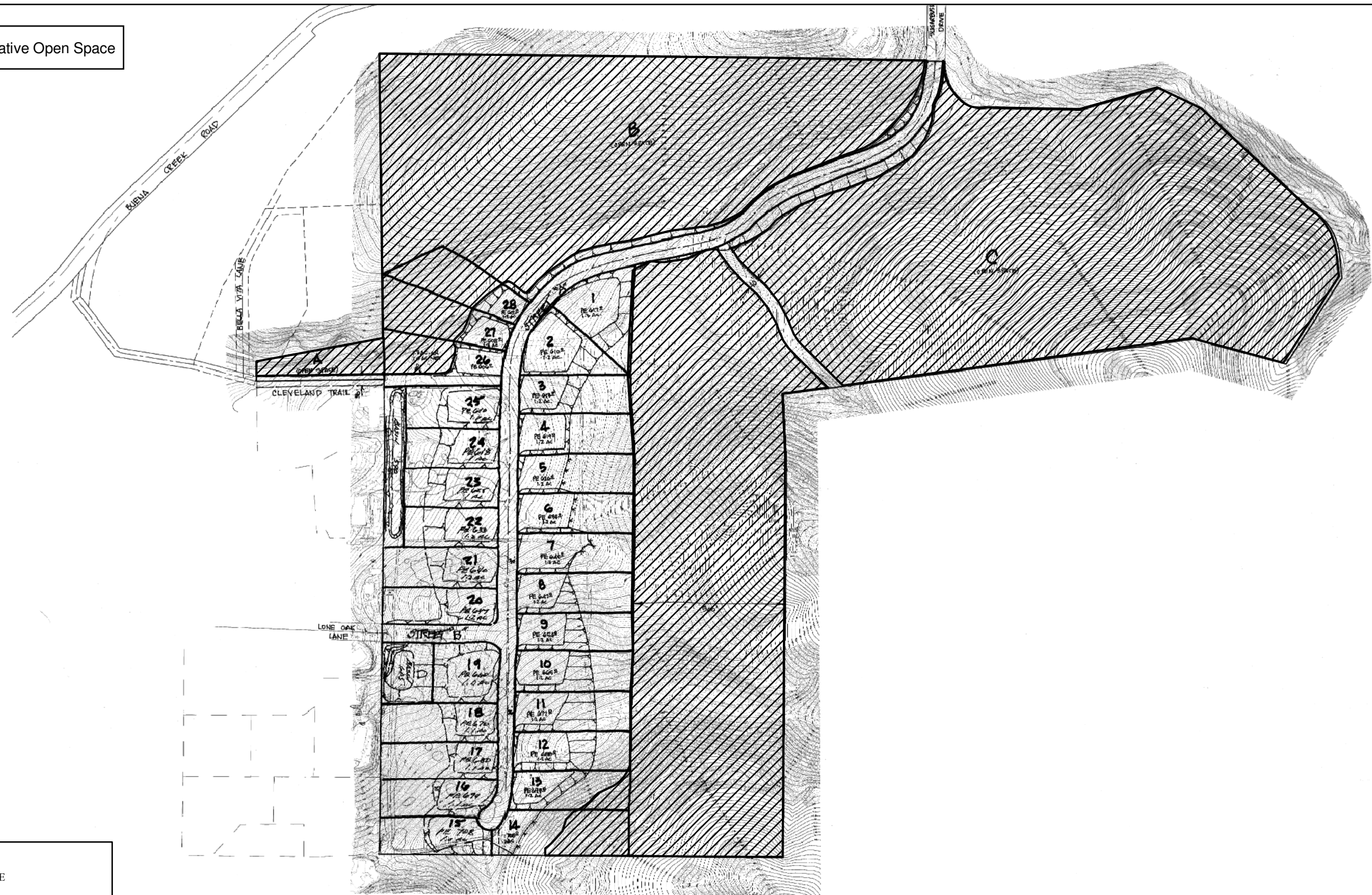
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No Project/Existing Zoning Alternative

SUGARBUSH RESIDENTIAL PROJECT

Figure 4-1

 Alternative Open Space



350 175 0 350
Feet

Job No: BOO-09 Date: 09/17/09

Source: bha, inc. (2009)

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Reduced Project Alternative

SUGARBUSH RESIDENTIAL PROJECT

Figure 4-2